

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re PATRICK FLANNERY : CHAPTER 13**  
**CAROLINE FLANNERY :**  
**Debtor(s) : BANKRUPTCY NO. 20-14177**

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Patrick & Caroline Flannery, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by **Philadelphia Federal Credit Union** on February 28, 2025. Debtors believe they can become current on all post-petition payments due under the April 22, 2021 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young  
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